



Justin S. Weddle  
212 - 997 - 5518 (o)  
347 - 421 - 2062 (m)  
jweddle@weddlelaw.com

**MEMO ENDORSED**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/14/22

March 14, 2022

**By ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: **United States v. Zhongsan Liu, 19 Cr. 804 (VEC)**

Dear Judge Caproni:

We write to request a modification to the Court's sealed order granting our request (ECF 154 and 167) to show (but not provide copies of) certain discovery materials (identified *ex parte* and under seal) to certain identified individuals and their counsel (also identified *ex parte* and under seal) in order to prepare the defense in this matter. With respect to the particular persons and discovery materials listed in the accompanying *ex parte* sealed exhibit (the "Exhibit"), we request permission to distribute copies of the materials, after apprising those persons of the Court's protective order in this matter and informing them that they are subject to that order. We respectfully request that the Court accept the Exhibit *ex parte* and under seal in order to protect defense strategy.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Justin S. Weddle'.

Justin S. Weddle

Application GRANTED. Defendant  
may file the request to show  
discovery materials to particular  
persons under seal.  
SO ORDERED.

A handwritten signature in blue ink that reads 'Valerie Caproni'.

3/14/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE